

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**ASSENTED-TO MOTION TO CONTINUE MOTION IN LIMINE FILING DEADLINE
TO DECEMBER 19, 2022**

Now comes the Defendant, Vladislav Klyushin, by and through undersigned counsel, and hereby respectfully moves this Honorable Court to continue the motion *in limine* filing deadline of December 15, 2022 to December 19, 2022.

This Honorable Court set a December 15, 2022, deadline for the filing of the parties' motions *in limine*. Dkt. 113. Due to family circumstance, one of Mr. Klyushin's attorneys needs additional time to finalize and review the motions with Mr. Klyushin. Additionally, the defense has sought additional information concerning the bases for one of the Government's expert witnesses' opinions to clarify, what, if any, challenges the defense will bring to the proposed testimony. Accordingly, with the assent of the Government, the defense respectfully requests this Honorable Court to extend the motion *in limine* filing deadline to December 19, 2022.

WHEREFORE, the defense respectfully requests that this motion be granted.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

The undersigned counsel has conferred with the Government, who by and through AUSAs Seth Kosto and Stephen Frank, assent to this request.

Respectfully Submitted,
Vladislav Klyushin,
By His Attorney,

/s/ Maksim Nemtsev
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Dated: December 15, 2022

CERTIFICATE OF SERVICE

I, Maksim Nemtsev, hereby certify that on this date, December 15, 2022, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Maksim Nemtsev
Maksim Nemtsev, Esq.